

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
JOANNE L. DIAMOND
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
Joanne_Diamond@fd.org

6 Attorney for Joshua A. Martinez

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 JOSHUA A. MARTINEZ,
14 Defendant.

Case No. 2:21-cr-00219-APG-DJA

**STIPULATION TO MODIFY
CONDITIONS OF RELEASE**

15
16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Schiess,
17 Assistant United States Attorney, counsel for the United States of America, and Joanne L.
18 Diamond, Assistant Federal Public Defender, counsel for Joshua Martinez, that the Court
19 modify his conditions of release.

20 The Stipulation is entered into for the following reasons:

21 1. On September 10, 2021, the Court ordered Mr. Martinez's release on a
22 personal recognizance bond with certain conditions, including a prohibition on travel to Las
23 Vegas, unless it is for a purpose and to a location as specified in the Appearance Bond, and
24 with the prior permission of Pretrial Services. ECF No. 13 at 6.

25 2. In addition to being on Federal Pretrial Release, Mr. Martinez is under pretrial
26 supervision by the State of Nevada. The conditions of Mr. Martinez's state supervision

1 require him to check in periodically at the Clark County Detention Center. The Clark County
2 Detention Center is not currently an approved location for Mr. Martinez to visit in Las Vegas.

3 3. Mr. Martinez moves the Court to modify his conditions to permit him to travel
4 to the Clark County Detention Center for purposes of complying with the conditions of his
5 state supervision, with the prior permission of Pretrial Services.

6 4. Counsel has spoken with Pretrial Services concerning this issue. Pretrial
7 Services support the requested modification.

8 5. The government has no objection to the requested modification.

9 DATED this 29th day of September, 2021.

10
11 RENE L. VALLADARES
12 Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

13 */s/ Joanne L. Diamond*
14 By _____
15 JOANNE L. DIAMOND
Assistant Federal Public Defender

/s/ Daniel Schiess
By _____
DANIEL SCHIESS
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 JOSHUA A. MARTINEZ,

7 Defendant.

Case No. 2:21-cr-00219-APG-DJA

8 **ORDER**

9
10 IT IS THEREFORE ORDERED that Mr. Martinez's conditions of release be modified
11 to allow him to travel to the Clark County Detention Center for purposes of complying with
12 the conditions of his state supervision, with the prior permission of Pretrial Services.

13 DATED this 30th day of September, 2021.

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16 UNITED STATES MAGISTRATE JUDGE
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